

# EXHIBIT D

ALEXANDER NORRIS vs MARC GOLDNER et al.  
Alexander Norris on 08/18/2022

## CERTIFIED COPY

17 VIDEOCONFERENCE DEPOSITION OF ALEXANDER NORRIS

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24 STENOGRAPHICALLY REPORTED BY:  
25 AIMEE EDWARDS-ALTADONNA, RPR, CSR No. 13979

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1 Q. We can circle back to that.

2 Mr. Norris, I'm going to upload Exhibit Number  
3 5 to the chat so that you can open it and review it.

4 Please let me know when you're ready to answer  
5 questions about that.

6 (Exhibit 5 was marked.)

7 THE WITNESS: Yes, I have it in front of me.

8 BY MR. DOLAN:

9 Q. Okay.

10 Mr. Norris, do you recognize Exhibit Number 5?

11 A. It looks like -- yes.

12 Q. Okay.

13 And have you seen Exhibit Number 5 before?

14 A. If it's the thing I've seen before, then yes.

15 Q. And what is Exhibit Number 5?

16 A. It's titled "Golden Bell and Alex Norris  
17 Collaboration Agreement."

18 Q. And I believe it's the fifth page of the PDF,  
19 the document as a whole, there's a signature on the  
20 bottom on the right-hand side.

21 Is that your signature?

22 A. Yes.

23 Q. Okay.

24 Mr. Norris, after you signed the agreement with  
25 Golden Bell, you had phone calls with and meetings with

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1 Marc Goldner and Rachel Korsen regarding how to proceed;  
2 is that correct?

3 A. Could you repeat the question, please?

4 Q. Did you speak with Marc Goldner and Rachel  
5 Korsen after you signed this agreement of how to proceed  
6 with the work?

7 A. Could you specify "speak"? What do you mean?

8 Q. Did you communicate with them via email, text  
9 message, phone calls, et cetera?

10 A. There were emails and a -- I believe one phone  
11 call after the signing of this.

12 Q. Okay.

13 And you guys discussed the plans for the  
14 projects; is that correct?

15 MS. PERDOMO: Objection.

16 THE WITNESS: Could you rephrase "projects,"  
17 please?

18 BY MR. DOLAN:

19 Q. Did you guys discuss the projects identified or  
20 related to this agreement?

21 MS. PERDOMO: Objection.

22 THE WITNESS: At the time I believed it to be  
23 one project, which was the -- you know, I signed this  
24 under the assumption it was for a single game and some  
25 promotion -- a promotional stuffed toy.

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1 BY MR. DOLAN:

2 Q. Okay.

3 So -- but you guys did discuss a line of toys?

4 A. Marc Goldner --

5 MS. PERDOMO: Objection.

6 THE WITNESS: -- as you've seen in other  
7 exhibits says hundreds of things at once. And I -- just  
8 because he said something doesn't mean that I agree with  
9 it.

10 BY MR. DOLAN:

11 Q. Okay.

12 But did you guys discuss stuffed animals in  
13 relation to this agreement?

14 MS. PERDOMO: Objection. Mischaracterizes the  
15 response.

16 THE WITNESS: Could you rephrase, please?

17 BY MR. DOLAN:

18 Q. Did you, Marc, and Rachel ever discuss stuffed  
19 animals in relationship to this agreement?

20 A. You mean after the agreement was -- after this  
21 point?

22 Q. At any point did the three of you discuss  
23 developing stuffed animals?

24 A. Yes. Although I believe at the time I was  
25 under the impression it was one stuffed promotional toy.

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1 Q. Give me just one moment, Mr. Norris. I'm ...

2 Mr. Norris, on the phone calls with Marc and  
3 Rachel, do you recall discussing Golden Bell publishing  
4 a calendar of Webcomic Name comics?

5 A. I believe it was one phone call.

6 Q. Okay.

7 But do you recall discussing a -- Golden Bell  
8 producing a calendar?

9 A. Could you rephrase the question, please?

10 Q. Do you recall speaking with Marc and Rachel  
11 about a calendar for Webcomic Name comics?

12 A. I recall Marc Goldner and Rachel talking about  
13 a calendar, yes.

14 Q. Do you recall saying anything about the  
15 calendar?

16 A. The phone call you're referencing was the first  
17 time I ever spoke to them, and I'm quite a agreeable  
18 person. I think that my responses to that would be  
19 trying to be polite in that moment and they didn't  
20 actually indicate what we were making -- I think we were  
21 supposed to be making a game; so ...

22 Q. Okay.

23 So do you or do you not recall responding to  
24 them regarding a calendar and what you said to them?

25 A. I don't recall what I said.

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1 CERTIFICATE OF STENOGRAPHIC REPORTER

2 I certify that the witness in the foregoing remote  
3 deposition, ALEXANDER NORRIS, was by me duly sworn in  
4 remotely to testify in the within-entitled cause; that  
5 said deposition was taken remotely at the time therein  
6 named; that the testimony of said witness was  
7 stenographically reported by me, a duly Certified  
8 Shorthand Reporter of the State of California authorized  
9 to administer oaths and affirmations, and said testimony  
10 was thereafter transcribed into typewriting to the best  
11 of my ability via remote teleconferencing.

12 I further certify that I am not of counsel or  
13 attorney for either or any of the parties to said  
14 deposition, nor in any way interested in the outcome of  
15 the cause named in said deposition.

16 The dismantling, unsealing, or unbinding of the  
17 original transcript will render the Reporter's  
18 Certificate null and void.

19 IN WITNESS WHEREOF, I have hereunto set my hand this  
20 1st day of September, 2022.

21  
22 Aimee Edwards Altadonna

23  
24 AIMEE EDWARDS-ALTADONNA, RPR  
Certified Shorthand Reporter  
25 Certification No. 13979